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REMARKS

This is a full and timely response to the final Official Action mailed November 30, 2005. Reconsideration of the application in light of the above amendments and the following remarks is respectfully requested.

Claim Status:

Claims 18-20 have been cancelled previously. Thus, claims 1-17 and 21-23 are currently pending for further action. No amendments are proposed by the present paper.

Prior Art:

Claims 1, 5-8 and 12-15 were rejected as being unpatentable under 35 U.S.C. § 103(a) in view of the combined teachings of U.S. Patent Application Publication No. 2002/0188435 to Labarge ("Labarge") and U.S. Patent No. 5,175,684 to Chong ("Chong"). For at least the following reasons, this rejection is respectfully traversed.

Claim 8 recites:

A method of executing a print job of an electronic document, said print job containing translations in a plurality of languages of said document, the method comprising, *in conjunction with submitting said print job to a printing device, prompting a user* through a graphical user interface to provide user input selecting one or more languages for translation of said document, and automatically translating said electronic document into one or more languages according to said user input with an electronic translation program such that said resulting print job contains hardcopies of said document in a plurality of languages. (emphasis added).

In contrast, the method taught by Labarge and Chong does not occur "in conjunction with submitting [a] print job to a printing device," as claimed. Labarge teaches a word processing application (210) that includes a translation tool (200). "At step 430, the list of translation services 208 are retrieved to the word processing application 210 and are

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populated into the drop-down menu 220, illustrated in FIG. 3. At step 435, the user locates the 'Japanese to English' command 209 and highlights the command. The user then selects the 'GO' button 232 to initiate translation of the selected document." (Labarge, paragraph 0075). When a translation is requested in this manner, the word processor (210) sends the document to an Internet browser (240). "[T]he Internet browser 240 performs an HTTP POST request to the translation server URL provided to the word processing application by the redirector server 235." (Labarge, paragraph 0079). "After the translated text is displayed by the user's Internet browser 240, the method ends at step 490." (Labarge, paragraph 0081). Thus, the translation is effected without a print job being submitted to a printing device.

Consequently, this method taught by Labarge has nothing to do with "submitting a print job to a printing device." There is no translation in the Labarge system that occurs "in conjunction with submitting said print job to a printing device."

Moreover, Labarge does not teach or suggest "*prompting a user ... to provide user input selecting one or more languages for translation of said document.*" (emphasis added). Rather, the user selects a translation function from a drop down menu (220) *without* being prompted. Consequently, Labarge fails to teach or suggest, "*in conjunction with submitting said print job to a printing device, prompting a user ... to provide user input selecting one or more languages for translation of said document.*" (emphasis added).

Chong likewise fails to teach or suggest this subject matter. The Chong system is designed primarily to allow a user to submit by fax or scanner a document in an original language. (Chong, abstract). The submitted document contains a written cover sheet in a particular format (*See, Fig. 2*) that is understood by the system as an instruction to translate the incoming document into another, target language. (Chong, col. 4, lines 64-68). The translation then occurs *without a print job being submitted to a printing device*. Moreover,

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the user is not *prompted* to enter input selecting one or more languages for translation of the document. Thus, Chong, like Labarge, fails to teach or suggest "*in conjunction with submitting said print job to a printing device, prompting a user ... to provide user input selecting one or more languages for translation of said document.*" (emphasis added).

"To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least these reasons, the rejection of claim 8 and its dependent claims should be reconsidered and withdrawn.

Claim 1 recites:

A system for executing a print job of an electronic document, said print job containing translations in a plurality of languages of said document, the system comprising:

a translation module of a *printer driver* running on a host computer, wherein said translation module accepts user input through a graphical user interface specifying at least one additional language into which a document of a print job is to be translated and calls a translation program to perform translation of the document; and

a printer for printing said print job including at least one hardcopy of said document translated into said additional language.  
(emphasis added).

In contrast, as demonstrated above, Labarge and Chong do not teach or suggest a translation module that operates in connection with a print job being submitted to a printing device. Along these lines, Labarge and Chong further fail to teach or suggest a printer driver with a graphical user interface that accepts user input specifying languages into which a print job will be translated by the printer driver calling a translation program.

As is well understood in the art, a printer driver is a piece of software specific to a given printer that formats a print job according to the specific operation of that printer. A

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word processor or Internet browser may interface with a printer driver in order to send a print job to a printer. However, a word processor is not a printer driver. An Internet browser is not a printer driver. One of skill in the art would understand what a printer driver is and what a printer driver is not.

Neither Labarge nor Chong teach or suggest a printer driver that accepts user input specifying languages into which a print job will be translated *by the printer driver calling a translation program*. "To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least these reasons, the rejection of claim 1 and its dependent claims should be reconsidered and withdrawn.

Independent claim 15 recites:

A printer driver stored on a medium for storing computer-readable instructions, said printer driver comprising:  
a graphical user interface for accepting user input; and  
a translation module, wherein said translation module receives user input specifying at least one additional language into which a document of a print job is to be translated and calls a translation program to perform translation of the document.

As demonstrated above, Labarge and Chong do not teach or suggest a printer driver as recited in claim 15. Specifically, the proposed combination of Labarge and Chong does not teach or suggest a printer driver with the capability to call a translation program and so obtain translations of a document in accordance with user input received through a graphical user interface *of that printer driver*

"To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)." M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least these

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reasons, the rejection of claim 15 and its dependent claims should be reconsidered and withdrawn.

Independent claim 23 was rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of Labarge, Chong, U.S. Patent No. 6,639,687 to Neilsen ("Neilsen") and U.S. Patent No. 6,592,275 to Aihara ("Aihara"). This rejection is respectfully traversed for at least the following reasons.

Claim 23 recites:

A system for executing a print job of an electronic document, said print job containing translations into one or more languages of said document, the system comprising:

a translation module of a *printer driver* running on a host computer, wherein said translation module accepts user input specifying at least one additional language into which a document of a print job is to be translated and automatically calls a translation program to perform translation of the document; and

a printer for printing said print job including at least one hardcopy of said document translated into said additional language;

wherein said translation module further accepts user input specifying a number of hardcopies of said document to be printed in an original and each additional specified language;

*wherein said printer comprises a plurality of output receptacles and said translation module further accepts user input specifying a number of hardcopies of said document in various languages to be output to specific output receptacles; and*

*wherein at least one output receptacle receives hardcopies of said document in a plurality of languages.*

(emphasis added).

As demonstrated above, the cited prior art of Labarge and Chong fails to teach or suggest the claimed printer driver that receives user input and calls a translation program. The other cited references in this rejection, Neilsen and Aihara, also fail to teach or suggest the claimed printer driver. For at least these reasons, the rejection of claim 23 should be reconsidered and withdrawn.

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Additionally, claim 23 recites that user input specifies “a number of hardcopies of said document in various languages to be output to specific output receptacles.” Without specific reference to claim 23, the Office Action erroneously argued that “Applicant’s arguments rely on the person printing being able to specify the output receptacle, *which is not explicitly claimed.*” (Action of 11/30/06, p. 2) (citation omitted) (emphasis added). This argument is incorrect, at least with respect to claim 23, which does explicitly recite that user input specifies the number of hardcopies in various languages to be output to specific output receptacles. The cited combination of prior art references fails to teach or suggest this feature of claim 23. For at least this additional reason, the rejection of claims 23 should be reconsidered and withdrawn.

Additionally, claim 23 recites that “at least one output receptacle receives hardcopies of said document in a plurality of languages.” The cited combination of prior art references does not teach or suggest that one receptacle receives hardcopies of a document in a plurality of languages.

The Office Action points out that Aihara teaches “associating a [specific] user with an output bin.” (Action of 11/30/05, p. 12). However, associating a specific user with an output bin is not the same as allowing a user to specify to which output receptacle a particular number hardcopies will go. Associating a specific user with an output bin is not the same as outputting copies of a document in a plurality of languages to a single output receptacle.

Clearly, the cited combination of prior art fails to teach or suggest many of the features of claim 23. “To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).” M.P.E.P. § 2143.03. Accord. M.P.E.P. § 706.02(j). For at least these reasons, the rejection of claim 23 should be reconsidered and withdrawn.

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Claims 2, 9 and 16 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of Labarge, Chong and Neilsen. This rejection is traversed for at least the same reasons given above with respect to the independent claims from which these claims depend.

Claims 3, 4, 10, 11, 17, 21 and 22 were rejected as being unpatentable under 35 U.S.C. § 103(a) over the combined teachings of Labarge, Chong, Neilson and Aihara. This rejection is respectfully traversed for at least the following reasons.

Claim 3 recites "wherein said printer comprises a plurality of output receptacles and said translation module further accepts user input specifying a number of hardcopies of said document in various languages to be output to specific output receptacles." Claims 10 and 17 recite similar subject matter.

In contrast, as discussed above, the combination of Labarge, Chong, Neilson and Aihara fails to teach or suggest this subject matter. Rather, Aihara, as cited, merely teaches assigning specific users to specific "bins" of a printing system. (Aihara, Figs. 11 and 13). Thus, any printing done by the specified user or intended for the specified user will go the specified bin. (Aihara, col. 6, lines 33-41) The person printing cannot, as in claim 3, specify the output receptacle to which a multi-lingual print job is printed. For at least this reason, the rejection of claim 3, 4, 10, 11 and 17 should be reconsidered and withdrawn.

Claim 4 recites "wherein at least one output receptacle receives hardcopies of said document in a plurality of languages." Claim 11 recites similar subject matter. In contrast, there is no teaching or suggestion in the prior art of record of outputting documents in

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multiple language to the same output receptacle. For at least this additional reason, the rejection of claims 4 and 11 should be reconsidered and withdrawn.

**Conclusion:**

For the foregoing reasons, the present application is thought to be clearly in condition for allowance. Accordingly, favorable reconsideration of the application in light of these remarks is courteously solicited. If the Examiner has any comments or suggestions which could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the number listed below.

Respectfully submitted,

DATE: January 30, 2006

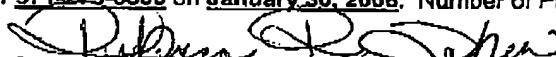
  
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